

EXHIBIT T

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4 IN RE: TERRORIST ATTACKS : 03-MDL-1570
ON SEPTEMBER 11, 2001 : (GBD)(SN)

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13 Deposition, taken via Zoom, of CHAS W.
14 FREEMAN, JR., commencing at 9:08 a.m., on
15 the above date, before Amanda
16 Maslynsky-Miller, Certified Realtime
17 Reporter and Notary Public in and for the
18 Commonwealth of Pennsylvania.

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1 immunity.

2 Q. In preparation for your
3 testimony for this deposition, did you
4 review any documents to refresh your
5 memory?

6 MR. GOETZ: Objection.

7 Form.

8 MR. HAEFELE: You may
9 answer.

10 THE WITNESS: Well, I
11 reviewed the documents provided by
12 plaintiffs' counsel. I reread the
13 9/11 report, which I had been
14 interviewed for but had not read
15 in its entirely previously.

16 I read -- I read the
17 documents that plaintiffs
18 submitted, intelligence documents,
19 diplomatic documents.

20 BY MR. HAEFELE:

21 Q. Anything else?

22 A. Pardon me?

23 Q. Anything else?

24 A. I don't think so.

1 Q. So, I'm sorry, it was the
2 9/11 Commission report, the intelligence
3 documents that you say plaintiffs
4 produced.

5 Is that what you're saying?

6 A. And one diplomatic cable
7 to -- of instruction to a post in the
8 Gulf. Yeah, there may have been one or
9 two other things. But that's essentially
10 it.

11 Let's just put it this way,
12 whatever defendants' counsel submitted to
13 me, I read.

14 Q. Did you review your report?

15 A. I reread it last night.

16 Q. All right. And when you
17 just gave me that list, the 9/11
18 Commission report, the intelligence
19 documents that the plaintiffs produced
20 and the diplomatic cable to the post in
21 the Gulf, are those documents that you
22 are saying that you read to prepare for
23 your deposition, or are you saying those
24 are documents that you read generally?

1 Q. And the methodology you used
2 here to render your expert report was
3 based primarily on your personal
4 experience and knowledge having been an
5 Ambassador in the Kingdom?

6 A. My professional experience
7 dealing with this and related issues,
8 both in Saudi Arabia and in prior
9 incarnations, one of which I mentioned.

10 Q. And to the extent that you
11 relied on any documents for your opinion,
12 they are listed in your report, I take
13 it; is that fair?

14 A. I did not rely on documents.

15 Q. Okay. We talked about the
16 time when you were an Ambassador and some
17 issues came up with regard to the Muslim
18 World League, a Saudi charity.

19 And I think you met with Mr.
20 Naseef in Jeddah to discuss with him some
21 issues regarding the diversion of funds
22 to support a terror group that came out
23 of a mosque in Birmingham, something to
24 that effect.

1 concluded at 8:42 p.m.)

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CERTIFICATE

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I, Amanda Maslynsky-Miller, Certified Realtime Reporter, do hereby certify that prior to the commencement of the examination, CHAS W. FREEMAN, JR., was remotely sworn by me to testify to the truth, the whole truth and nothing but the truth.

7

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place and on the date hereinbefore set forth, to the best of my ability.

10

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.

14

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16

Amanda Miller

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Certified Realtime Reporter

Dated: April 18, 2021

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(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)

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1 INSTRUCTIONS TO WITNESS

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3 Please read your deposition
4 over carefully and make any necessary
5 corrections. You should state the reason
6 in the appropriate space on the errata
7 sheet for any corrections that are made.

8 After doing so, please sign
9 the errata sheet and date it.

10 You are signing same subject
11 to the changes you have noted on the
12 errata sheet, which will be attached to
13 your deposition.

14 It is imperative that you
15 return the original errata sheet to the
16 deposing attorney within sixty (60) days
17 of receipt of the deposition transcript
18 by you. If you fail to do so, the
19 deposition transcript may be deemed to be
20 accurate and may be used in court.

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E R R A T A

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3 PAGE LINE CHANGE / REASON

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ACKNOWLEDGMENT OF DEPONENT

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I, _____, do
hereby certify that I have read the
foregoing pages, 1 - 511, and that the
same is a correct transcription of the
answers given by me to the questions
therein propounded, except for the
corrections or changes in form or
substance, if any, noted in the attached
Errata Sheet.

7

8

CHAS W. FREEMAN, JR.

DATE

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Subscribed and sworn
to before me this
____ day of _____, 20____.

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My commission expires: _____

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Notary Public

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LAWYER'S NOTES

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